

ORIGINAL

1 JMartinez.5k1.1

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FILED

DISTRICT COURT OF GUAM

SEP 30 2005

MARY L.M. MORAN
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF GUAM

12 UNITED STATES OF AMERICA,)	CRIMINAL CASE NO. <u>00-00128</u>
13 vs.)	GOVERNMENT'S MOTION FOR A DOWNWARD DEPARTURE UNDER USSG § 5K1.1 AND 18 U.S.C. § 3553(e)
14 JOHN S. MARTINEZ,)	
15 Defendant.)	

16 Comes now the United States and moves, pursuant to USSG § 5K1.1 and 18 U.S.C.
17 § 3553(e), for a substantial assistance downward departure from Offense Level 15 to Level 8, an
18 advisory guideline range of 0 to 6 months. The government intends to recommend a sentence

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1 of probation, and the reasons for such recommendation are set forth in a memorandum, which the
2 government is seeking to lodge under seal for reasons of security.

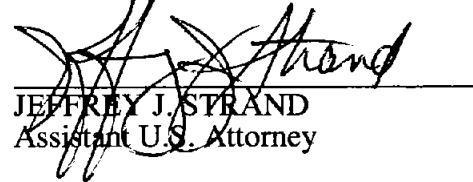
3 RESPECTFULLY SUBMITTED this 30th day of September, 2005.

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5 NOEL L. HILLMAN
Chief, Public Integrity Section
Department of Justice

6 RUSSELL C. STODDARD
7 First Assistant U.S. Attorney
Districts of Guam and NMI

8 By:

9 JEFFREY J. STRAND
10 Assistant U.S. Attorney

A handwritten signature in black ink, appearing to read "Strand", is written over a horizontal line. The line starts under the "J" in "Jeffrey" and ends under the "A" in "Attorney".